



U.S. Department of Justice

*United States Attorney
Eastern District of New York*

JN/DKK/LB/CJN
F. #2017R05903

*271 Cadman Plaza East
Brooklyn, New York 11201*

January 14, 2021

By Email and ECF

Thomas C. Green
Mark D. Hopson
Michael Levy
Joan M. Loughnane
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David Bitkower
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Re: United States v. Huawei Technologies Co., Ltd., et al.
Criminal Docket No. 18-457 (S-3) (AMD)

Dear Counsel:

Enclosed please find the government's production of discovery in accordance with Rule 16 of the Federal Rules of Criminal Procedure. This discovery supplements the government's previous productions. The discovery is being produced pursuant to the Protective Order entered by the Court on June 10, 2019. See ECF Docket Entry No. 57. The government also requests reciprocal discovery from the defendants.

I. The Government's Discovery

Document Description	Category of Discovery Pursuant to Protective Order	Bates Range
Financial institution records, including transactional records	Discovery Material ("DM")	DOJ_HUAWEI_A_0008712507 – DOJ_HUAWEI_A_0008712512
Financial institution records, including compliance and transactional records	Sensitive Discovery Material ("SDM")	DOJ_HUAWEI_A_0008712513 – DOJ_HUAWEI_A_0008714665

Document Description	Category of Discovery Pursuant to Protective Order	Bates Range
Financial institution records, including transactional records	DM	DOJ_HUAWEI_A_0008714666
Financial institution records, including compliance and transactional records	SDM	DOJ_HUAWEI_A_0008714667 – DOJ_HUAWEI_A_0008715087
Court filings	DM	DOJ_HUAWEI_B_0000015425 – DOJ_HUAWEI_B_0000015467
Immigration records	DM	DOJ_HUAWEI_B_0000015468-DOJ_HUAWEI_B_0000015474

Furthermore, below is account information regarding certain Citibank accounts:

- Account #30848301, Huawei Device USA, opened Nov 14, 2011;
- Account #30848387, Huawei Device USA;
- Account #30848395, Huawei Device USA, opened Nov 14, 2011;
- Account #30984178, Huawei Device USA;
- Account #38872779, Huawei Device USA, opened August 6, 2013; and
- Account #36313527, China Petroleum Engineering & Construction.

Very truly yours,

SETH D. DuCHARME
Acting United States Attorney

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Trial Attorneys

cc: Clerk of the Court (AMD) (by ECF) (without Enclosures)